

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
GREENVILLE DIVISION**

MARKUS CARSON

Plaintiff,

v.

**AMERICAN EQUIPMENT COMPANY,
INC.**

Defendant.

Civil Case No.

Judge:

PLAINTIFF'S INTERROGATORIES PURSUANT TO LOCAL RULE 26.01

- A. State the full name, address and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

RESPONSE: Plaintiff is unaware of any subrogation interest in the claims.

- B. As to each claim, state whether it should be tried jury or nonjury and why.

RESPONSE: Claims in Plaintiff's Complaint should be tried by jury, to which he is entitled pursuant to the Seventh Amendment of the United States Constitution and 42 U.S.C. § 1981, the statute under which Plaintiff's claims are brought.

- C. State whether the party submitting these responses is a publicly-owned company and separately identify (1) any parent corporation and any publicly-held corporation owning ten percent (10%) or more of the party's stock; (2) each publicly-owned company of which it is a parent; and (3) each publicly owned company in which the party owns ten percent (10%) or more of the outstanding shares.

RESPONSE: Plaintiff is an individual; plaintiff is not a publicly owned company.

- D. State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

RESPONSE: This division is appropriate because Defendant does business relating to the events or omissions alleged in this Complaint, specifically, with a warehouse in Greenville, South Carolina at its headquarters, where the majority of events or omissions alleged in the Complaint took place.

- E. Is this action related in whole or in part to any other matter filed in this district, whether civil or criminal? If so, provide (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases that *may be* related regardless of whether they are still pending. Whether cases *are* related such that they should be assigned to a single judge will be determined by the clerk of court based on a determination of whether the cases arise from the same or identical transactions, happenings or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

RESPONSE: Plaintiff is unaware of any related matters filed in this district.

Dated: October 15, 2019

Respectfully Submitted,

By: s/ Bakari T. Sellers

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To Be Admitted Pro Hac Vice